UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

JUN - 8 2010

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE

Robert E. Rudd, Vice President
Engineering, Environmental and Transportation
Coyne International Enterprises Corp.
140 Cortland Avenue
Syracuse, NY 13221

Re: Clean Air Act Reporting Requirement and Testing Order, Docket No. AAA-10-0018

Dear Mr. Rudd:

The United States Environmental Protection Agency ("EPA") is evaluating whether Coyne International Enterprises Corp., doing business as Coyne Textile Services of New Bedford, Massachusetts ("Coyne"), is in compliance with the Clean Air Act (the "Act") and state and federal regulations promulgated under the Act. These requirements include but are not limited to a Massachusetts Limited Plan Approval dated 7/13/94, and federally enforceable sections of the Massachusetts State Implementation Plan regulations at 310 CMR 7.00 et. seq.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether a facility is in compliance with the Clean Air Act. This letter requires Coyne to provide specific information about its New Bedford facility as described in the Reporting Requirement section. In addition, this letter orders Coyne to test emissions from its New Bedford facility as described in the Testing Order section.

EPA previously issued a Reporting Requirement and Testing Order (RR/TO) to Coyne on July 16, 2009. EPA is issuing this second reporting requirement to acquire additional information relating to Coyne's New Bedford, Massachusetts facility and to establish a new schedule for emission testing. To the extent Coyne has submitted information in response to the first EPA reporting requirement, which is also responsive to this second reporting requirement, Coyne

should so state in its response where appropriate and indicate the date such information was previously submitted. Coyne does not need to submit such information a second time.

Reporting Requirement

Within 60 days of receiving this letter, Coyne is required to provide the following information:

1. Provide a list of all Coyne customers that have had towels laundered at the New Bedford facility since July 1, 2009, specifying the client's name, city or town, and state, and the types of towels generated by this customer (reddish purple, orange, white, or a combination of these categories specifying the percentage of each category of towels). Specify:
    a. Weight of soiled towels generated by each customer;
    b. Frequency of receipt of towels from each customer, and
    c. Standard Industrial Code (SIC code) or North American Industry Classification Code (NAICS code) applicable to each customer.

2. Indicate any changes in towel processing that have occurred since your response to EPA's July 2009 RR/TO, including, but not limited to the following:
    a. Any change in the percentage of print or shop towels processed relative to other types of laundry handled by the facility. If a change has occurred, indicate the percentage by mass of print or shop towels processed per month for the period July 1, 2009 to present, and explain why this differs from the percentages specified in response to the EPA RR/TO of July 2009.
    b. State whether Coyne has rejected any towels for processing due to excess fluid content or any other rationale. If so, specify:
        i. The type of towel and the dates of each occurrence,
        ii. the reason(s) the towels were rejected,
        iii. the Standard Industrial Code (SIC code) or North American Industry Classification Code (NAICS code) applicable to the generator of these towels, and
        iv. the name and address of the facility where these towels were ultimately sent for processing, if known.

3. Specify the total pounds per month of print and shop towels processed by Coyne, by towel type (reddish purple towels, orange towels and white towels), for the period July 2009 to present.

4. In response to question 7c. of EPA's RR/TO of July 16, 2009, Coyne provided data on the maximum quantity in pounds of soiled towels processed per day in each of the following categories: reddish purple towels, orange towels and white towels. Based upon processing data from July 1, 2009 to present, indicate whether these maximum quantities are still applicable.

5. Describe any limitations that may affect the potential to emit (PTE) of volatile organic compounds and hazardous air pollutants from the processing of soiled towels at the Coyne facility in New Bedford.

6. Provide copies of analytical results for wastewater samples collected by Coyne, the City of New Bedford, or contractors hired by either Coyne or the City of New Bedford from July 1, 2009 to present.

7. Provide documentation associated with any off-site shipment of sludges from the New Bedford facility, and analytical results associated with these shipments, for the period July 1, 2009 to present.

Testing Order

This Testing Order ("TO") requires Coyne to sample and test emissions of VOCs from its towel operations at the New Bedford facility.

Within the number of days specified in each paragraph below, Coyne is required to provide all the information and take the steps outlined below.

1. Within 30 days of receipt of this TO, contact EPA's Bill Osbahr, at 617-918-8389, to schedule a pre-test conference. At the pre-test conference, EPA will review with Coyne the various sampling, monitoring, testing, and analysis locations, procedures, and methods to be followed on the date(s) of the tests.

2. Within 60 days of receipt of this TO, prepare and mail to EPA a pre-test protocol for testing all sources of VOC emissions from towel operations at the New Bedford facility (including the towel press, dryer stack, washer drain trench vent and the wastewater treatment room), using the applicable methods in 40 C.F.R. Part 60, Appendix A.

3. Within 90 days of receipt of this TO, attend a pre-test conference with EPA, and schedule the testing date(s).

4. Within 120 days of receipt of this TO, conduct testing to measure VOC emissions from towel operations at the New Bedford facility. Note that Coyne may have to create a temporary (or permanent) total enclosure around the wash room prior to conducting testing. Testing is to be conducted under a worst-case scenario with heavily soiled shop and print towels.

5. Within 30 days of completing each test, submit a complete test report to EPA.

Attachment A to this TO provides lists of required elements for pre-test protocols and test reports. Mail the submissions required by this letter to:

Susan Studlien, Director
Office of Environmental Stewardship
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100, OES04-2
Boston, MA 02109-3912
Attn: Joan Jouzaitis, Air Technical Unit (Mail Code OES04-2)

Be aware that if Coyne does not provide the requested information, EPA may order Coyne to comply and may assess monetary penalties under Section 113 of the Act, 42 U.S.C. § 7413. Federal law also establishes criminal penalties for providing false information to EPA. This reporting requirement is not subject to Office of Management and Budget review under the Paperwork Reduction Act.

Coyne may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Note that certain categories of information are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to Coyne

If you have any questions regarding this information request, please contact Joan Jouzaitis, Environmental Engineer, at (617) 918-1846 or, have your attorney call Thomas T. Olivier, Senior Enforcement Counsel at (617) 918-1737.

Sincerely,

Susan Studlien

Susan Studlien, Director
Office of Environmental Stewardship

Enclosures

cc:

Bill Osbahr, EPA, OEME
Gregg Hunt, MassDEP, Southeast Regional Office

Enclosure

Attachment A to Testing Order

REQUIREMENTS FOR EMISSION TESTING

A. PRETEST INFORMATION REQUIREMENTS

In order to establish uniform requirements and help ensure that proper test methods and procedures are utilized, the information specified below must be submitted to EPA Region I - New England at least 30 days prior to the scheduled test date. In the event of any deficiencies or discrepancies in the test protocol, the company will be notified. Submission of this information will minimize the possibility of a test rejection resulting from improper sampling or data collection procedures.

Except as otherwise provided by EPA, testing shall be performed in strict accordance with procedures specified in the Code of Federal Regulations ("C.F.R."), Title 40, Part 60, Appendix A, Standards of Performance for New Stationary Sources, as amended, or in Title 40, Part 61, Appendix B, National Emission Standards for Hazardous Air Pollutants, as amended. Any variations in the sampling or analytical procedures must be indicated in the pretest information and receive written approval from EPA prior to testing.

The information to be submitted must include at a minimum:

1. Identification and a brief description of the source to be tested. The description should include:

    a. Type of industrial process or combustion facility;

    b. Type and quantity of raw and finished materials used in the process;

    c. Description of any cyclical or batch operations which would tend to produce variable emissions with time;

    d. Basic operating parameters used to regulate the process; and

    e. Rated capacity of the process.

2. A brief description of the air pollution control equipment associated with the process, including:

    a. Type of control device;

    b. Operating parameters;

c. Rated capacity and efficiency; and

d. Ultimate disposal of wastes.

3. Type of pollutant to be sampled (particulate matter, NOx, SO2, hydrocarbons, etc.).

4. A description of the emission sampling equipment, including a schematic diagram of the sampling train.

5. A description of the sampling and analysis procedures (reference standard methods, if applicable). Indicate any proposed variations with justification.

6. A sketch with dimensions indicating the flow of exhaust gases from the process, through the control equipment and associated ductwork to the stack.

7. In accordance with 40 C.F.R. Part 60, Method 1:

   a. An elevation view of the dimensions of the stack configuration indicating the location of the sampling ports and distances to the nearest upstream and downstream flow interferences; and

   b. A cross-sectional sketch of the stack at the sampling location with dimensions indicating the location of the sampling traverse points.

8. Estimated flue gas conditions at sampling location, including temperature, moisture content, and velocity pressure.

9. A description of the process and control equipment operating data to be collected during the sampling period.

10. Copies of the field data sheet forms to be used during the tests.

11. Names and titles of personnel who will be performing the tests.

12. A description of the procedures for maintaining the integrity of the samples collected, including chain of custody and quality control procedures.

13. Calibration sheets for the dry gas meter, orifice meter, pilot tube, and/or any other equipment that requires calibration.

14. A list of pre-weighed filters to be used during particulate emission testing, including identification and tare weights.

(Note: Items No. 13 and 14 must be submitted prior to actual testing, but do not have to be included with the pretest information.)

B. EMISSION TEST REPORT REQUIREMENTS

The emission test report must contain all pertinent data concerning the tests, including a description of the process and operating conditions under which the tests were made, the results of the tests, and test procedures. While the exact format of the report will vary depending upon the type and objective of the tests, below is a suggested format containing elements that must be incorporated in the report.

1. Introduction

    a. Identification, location, and dates of tests;

    b. Purpose of tests;

    c. Brief description of source; and

    d. Name and affiliation of person in charge of tests.

2. Summary of results

    a. Operating and emission data; and

    b. Comparison with applicable emission regulations.

3. Source description

    a. Description of process including operation of emission control equipment;

    b. Flow sheet (if applicable);

    c. Type and quantity of raw and finished materials processed during the tests;

    d. Maximum normal rated capacity of the process; and

    e. Description of process instrumentation monitored during the test.

4. Sampling and analytical procedures

    a. Description of sampling train and field procedures;

    b. Description of recovery and analytical procedures;

    c. Sketch indicating sampling port locations relative to process, control equipment upstream and downstream flow disturbances; and

d. Sketch or cross-sectional view of stack indicating traverse point locations.

5. Test results and discussion

   a. Detailed tabulation of results including process operating conditions, flue gases conditions;

   b. Discussion of significance of results relative to operating parameters and emission regulations; and

   c. Discussion of any divergences from normal sampling procedures or operating conditions which could have affected the test results.

6. Calculation and data reduction methods

   a. Description of computational methods, including equation format used to obtain final emissions results from field data; and

   b. Sample calculations from at least one run of each type of test performed.

7. Appendix

   a. Copies of all field data collected during the test, including sampling data sheets and process operating logs;

   b. Copies of all analytical laboratory data;

   c. Calculation sheets or computer input and output data;

   d. Sampling equipment and laboratory calibration data;

   e. Names and titles of personnel and organizations participating in the tests;

   f. Visible emission observations performed during the tests (if required); and

   g. Copies of all chain of custody information.